



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

January 12, 2023

**BY ECF AND EMAIL**

The Honorable Richard M. Berman  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**Re: United States v. Robert Hadden, S2 20 Cr. 468 (RMB)**

Dear Judge Berman:

The Government respectfully submits this letter to advise the Court regarding resolution of the disputes raised this morning concerning medical records offered by the defendant, as well as a summary chart of medical records to be presented by the Government through a paralegal.

The parties have agreed that the defendant will not offer any medical records other than two blank examination forms (from Columbia and NewYork-Presbyterian Hospital, respectively), and the Government will not argue (a) that the appointments reflected on the Government's medical record summary chart—which will be presented as a pedagogical demonstrative tomorrow but not offered into evidence—were themselves medically unnecessary (although the Government may argue that conduct at those appointments was medically unnecessary), or (b) that the defendant performed legitimate medical care without documenting such care (although the Government may argue that Hadden performed abusive and/or assaultive conduct which he did not document).

The parties agree that this resolution obviates the need for the briefing the Court had ordered be conducted by 3:00 p.m. today.

Respectfully submitted,

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United States Attorney

by: s/ \_\_\_\_\_  
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cc: Defense Counsel (By Email and ECF)